

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**MEYER, SUOZZI, ENGLISH & KLEIN, P.C.,**

**Plaintiff,**

**-against-**

**MATHEW K. HIGBEE, Esq.,  
NICK YOUNGSON,  
RM MEDIA, LTD.,  
and HIGBEE & ASSOCIATES,**

**Defendants.**

**Docket No.: 18-cv-3353 (ADS) (ARC)**

**MOTION FOR  
DEFAULT JUDGMENT**

Plaintiff Meyer, Suozzi, English & Klein, P.C. (“Plaintiff”) hereby moves the Court pursuant to Federal Rule of Civil Procedure 55(b) and Local Civil Rule 55.2 to enter default judgment in favor of Plaintiff and against Defendants Nick Youngson and RM Media, Ltd. (together, the “RM Defendants”) on the grounds that the RM Defendants failed to answer or otherwise defend against the complaint, and a Certificate of Default has been duly issued by the Clerk of this Court.

Dated: Garden City, New York  
March 4, 2019

MEYER, SUOZZI, ENGLISH & KLEIN, P.C.

By: \_\_\_\_\_/s/\_\_\_\_\_

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